

To: FCC
From Young Warriors International
Re: comments on our request for exemption of closed captioning requirements.
Proceeding # 06-181
File # 0660
March 13th 2007

In response to Telecommunications for the Deaf and Hard of Hearing, Inc., et. comments

We appreciate Telecommunications for the deaf and hard of hearing recommendation for us to receive our requested 3 year exemption from closed captioning. In response however to their stated concerns of our failure to fully comply with the FCC statutes and requirements for exemption we would like to submit the following additions to our request for exemption.

Below is a list of cost from closed captioning services and their prices. We had felt that their was substantial and sufficient documentation about the cost of outsourcing closed captioning already provided to the commission from other petitioners but in response to the comments we are please to provide our own. The cost that we found were even higher than that which we stated in our request for exemption.

The following are prices from various Closed Captioning companies as posted on their web sites

Company: Custom Captions

Web address : <http://customcaptions.com/#PRICELIST>

PRICE LIST	
Closed Captioning - Roll-Up	\$10.00/minute – 60+ minutes \$12.00/minute – less than 60 minutes

Closed Captioning/Subtitling - Pop-On	\$15/minute – 30+ minutes \$20/minute – less than 30 minutes
Open Captioning - Pop-On (There is no black box around captions.)	\$15/minute – 30+ minutes \$20/minute – less than 30 minutes
Pricing Includes: Formatted captions Script transcription or verification Punctuation review Electronic copy of proof script Synchronized captioning	Electronic reading speed check Complimentary VHS proof copy Return mailing costs Final master or formatting
You Provide: finished Betacam or DigiBeta master with continuous time code media file for DVD/webcasts VHS copy of the master with the master's time code on left audio track at -5 dB, and mixed audio on dub w/timecode on the right audio track	You Receive: your original plus Betacam or DigiBeta encoded master or compatible authoring file compatible formatting and authoring file SVHS or VHS captioned video

[This company would cost us \$450.00 per program]

Caption and Subtitle services LTD

Post-production captions and subtitles:

These rates include producing a caption or subtitle file, confirming sync and proper placement, and a VHS open caption approval copy (video masters only). Tape stock and shipping are additional. Turnaround time is discussed to meet your deadline.

Pricing Structure

Please note that discounts may apply. Call for a quote.

2631 East Cass Street, 2nd floor

Joliet, IL 60432

Phone: (815) 740-1009 • Fax: (815) 740-6270

Email: info@capsubservices.com
www.capsubservices.com

“Roll-Up” — \$5 to \$10 per minute (\$300 minimum):

In this style of captioning the script continuously scrolls up from the bottom of the screen with two to four lines on the screen at one time. This style is used for documentaries, narration or programs with minimal characters on the screen at any time.

“Pop-On” — \$10 to \$12 per minute (\$300 minimum):

This style is used for both subtitles and captions. The sentence structure is broken into fragments that pop on and off the screen to keep pace with the rhythm of the narration or dialogue. This style is used in dramas, sit-coms and programs with multiple characters. The captions are strategically placed on the screen, which helps the viewer identify who is speaking.

TV Spots and PSAs — \$150 each

Music Videos — \$250 each

Digital (SDI) or Component Encoding — \$75 per half-hour (\$75 minimum):

This encoding service is necessary for producing a Betacam SP, DigiBeta, DVCam or other high-quality caption-encoded videotape master of your program.

DVD and Webcast Subtitles — \$10 per minute (\$300 minimum):

We can produce and export subtitle files to support specific DVD authoring systems and media players. Ask about what systems are supported.

Caption or Subtitle Exports — \$25 per export:

We can export files ready to import into your Non-Linear Editing system or DVD authoring software. Ask about what systems are supported.

Extraction Services — \$50 per half-hour plus \$50 file export:

We can extract captions with time code numbers from existing captioned videos. The cost is \$50 per half-hour to create a caption file. These files can be exported to accommodate DVD authoring systems or NLEs for \$50 per file. If a scroll-up style of caption is required, add \$10 per minute for reformatting.

Foreign Languages:

Our services include Spanish and other foreign languages. Don't miss out on sharing your message with the diverse communities here in America and overseas. Please call to confirm availability for specific languages.

You will need the following to begin the caption/subtitle process:

For video captions, a VHS copy of a final, edited master with time code recorded on audio channel 2 at 0 to -5db. The time code must match the time code on the master. If you do not have the equipment to produce a VHS copy, we can provide that service for a minimal fee.

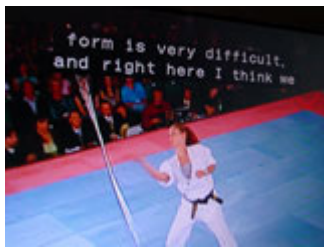
For DVD captions or subtitles, a digital copy of your video project, either uploaded to our FTP server or sent to us on DVD.

For narration-only projects, a script of the narration can be emailed to us at andy@capsubservices.com, or we can provide transcription services for \$3 per minute.

Rev. 03/06

[This company would cost us 375.00 minimum per week.
\$300 for caption service + \$75 for encoding to BetaSP]

Closed Captioning Text



Carr-Hughes Productions offers full service Closed Captioning. Experienced captioners utilize CPC Captionmaker to ensure the highest quality captioning possible. We specialize in various genres, and programs of any length can be captioned in a timely manner.

The Federal Communications Commission rules require that television programs distributed directly to home viewers be captioned. Let Carr-Hughes Productions service all your Closed Captioning needs.

Captioning Rates:

\$275 per 30 minute program (with script provided by the client)
\$550 per 60 minute program (with script provided by the client)
\$825 per 90 minute program (with script provided by the client)
\$1100 per 120 minute program (with script provided by the client)

If scripts are not provided there is an additional transcribing fee of \$50.00 per hour (a 60 minute program takes approximately five hours to transcribe).

Prices do not include any necessary conversions/tape stock fees



31 Hovey Road · Greenfield Center, NY 12833
Tel 518.893.2123 Fax 518.893.2186
[email](mailto:andy@capsubservices.com)

[This company would cost us \$525 per week. \$275 for
encoding + \$250 for transcribing]

As far as the comments that we have failed to provide proof that the addition of closed captioning would be an undue burden we are a little confused. Since

we provided a Cash flow affidavit clearly showing the small amount of income we operate under and where the expenses are spent we don't understand what more they wanted us to supply. We are more than please to provide any further specific information that the commission may need to make their decision.

Thank you again for your time and consideration.

Steve Foss
President
Young Warriors International